

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Eric CASERES

Case No. 5:21-mj-1513

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/20/2021 in the county of Duval in the  
Southern District of Texas, the defendant(s) violated:

Code Section

8 U.S.C. 1324(a)(3)(A)

Offense Description

Any person who, during any 12-month period, knowingly hires for employment at least 10 individuals with actual knowledge that the individuals are aliens described in subparagraph (B) shall be fined under title 18 or imprisoned for not more than 5 years, or both.

This criminal complaint is based on these facts:

See Attachement "A"

☒ Continued on the attached sheet.

/s/Ramon Deliz

Complainant's signature

Ramon Deliz/ Special Agent/ HSI

Printed name and title

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed. R. Crim. P. 4.1:

Date: 06/20/2021



Judge's signature

City and state: Laredo, Texas

Diana Song-Quiroga, U.S. Magistrate Judge

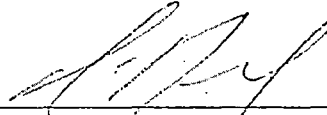
Printed name and title

**Attachment "A"**

I, Special Agent **Ramon Deliz**, hereby declare under penalty of perjury that:

1. On June 20, 2021, at approximately 9:30 a.m., a caravan consisting of a dark colored Ford tractor hauling a camper, three (3) vans and a red Chevrolet Silverado, showed up at the United States Border Patrol (USBP) checkpoint located at Farm-to-Home (FM) Road 1017 in Hebbronville, Duval County, Texas (TX). The lead vehicle, the dark colored Ford tractor, was being driven by an adult male, later identified as Eric CASERES. During his inspection, CASERES stated that he was a Supervisor for 2JM Produce the vans that were behind him were his employees and that they all were legal. USBP inspected CASERES' vehicle and camper and released him after not finding any contraband.
2. An immigration inspection of the occupants of the three vans and a red Chevrolet Silverado that were part of the caravan, revealed 38 noncitizens (37 adults and 1 minor). Of these, 30 noncitizens were from Mexico, four (4) from Guatemala, three (3) from Honduras and one (1) from Nicaragua.
3. On June 20, 2021, at approximately 3:16 p.m., Homeland Security Investigations (HSI), Deputy Special Agent in Charge, Laredo office was contacted by the USBP. On that same date, at approximately 5:30 p.m., HSI agents identified and interviewed four (4) material witnesses: Lilia MORALES-Ramirez, Addy Minelly GUERRA-Diaz, Arnulfo Carmelino GOMEZ-Salas and Pablo Jose CANASTUJ-Reyes. The material witnesses are citizens and nationals of Mexico and Guatemala. All the material witnesses stated they are foreign nationals illegally present in the US. All material witnesses indicated that a few days before the incident, they were told that there was going to be work at a watermelon field in Dilley, TX and whoever was interested had to show up in the early morning of June 20, 2021 at their place of employment in Edinburg, TX and be ready to leave for four (4) to five (5) weeks of work. On June 20, 2021, they showed up at the cited location and CASERES started giving instructions and selecting drivers for the above-mentioned vans and paid for the gasoline of all vehicles. Before departing, he asked who had their "papers" and some raised their hands. He then told the ones who had not raised their hands to sit between workers who had their "papers". CASERES also told the workers that they were going to go through a checkpoint and to "not get nervous"; and if they were asked if they were United States (US) citizens, to respond: "Yes, sir." Finally, CASERES told the workers to say that they were from McAllen, TX.
4. One of the non-citizens stated that he had been working with the above-mentioned company for approximately six (6) months, and that about a month and a half after he started working, he approached CASERES and told him that he did not had "papers" and CASERES told him to try to get "papers" but let him continue working for the company.

5. On that same date, HSI agents showed the material witnesses a photo lineup that contained CASERES' photograph along with other five (5) similarly looking individuals and all of them identified CASERES as the manager and leader of the caravan.



Ramon Deliz,  
Special Agent  
Homeland Security Investigations

Having reviewed the foregoing declaration, I find probable cause that the defendants named above committed an offense against the laws of the United States of America and may therefore be further detained pending presentment before a judicial officer.

Executed on the 22<sup>nd</sup> day of June 2021.



United States Magistrate Judge

6.22.21

Date